

MELINDA HAAG (CABN 44332)
United States Attorney

MIRANDA B. KANE (CABN 150630)
Chief, Criminal Division

TRACIE L. BROWN (184339)
Assistant United States Attorney
450 Golden Gate Ave., Box 36055
San Francisco, California 94102
Telephone: (415) 436-7200
Fax: (415) 436-7234
E-Mail: tracie.brown@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
GINA TCHIKOVANI,)
)
Defendant.)

No. CR 10-100 MHP

STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE SENTENCING
HEARING

The parties hereby stipulate as follows:

1. Defendant Gina Tchikovani, represented by Charles Bourdon and Ruth Edelstein, is currently set for sentencing on January 24, 2011, at 10:00 a.m.

2. In order to provide meaningful and accurate sentencing memoranda for the Court, the parties need additional time to analyze and research some of the financial information set forth in the final Presentence Report.

3. Accordingly, the parties submit this stipulation and proposed Order requesting the Court to (1) vacate the January 24, 2011 sentencing hearing, and (2) reset the sentencing hearing

March 7
for ~~February 28~~, 2011, at 10:00 a.m., which is the first Monday on which all counsel and the
Probation Officer are available.

DATED: 1/19/11

/s/
RUTH EDELSTEIN/CHARLES BOURDON
Attorney for GINA TCHIKOVANI

DATED: 1/19/11

/s/
TRACIE L. BROWN
Assistant United States Attorney

~~[PROPOSED]~~ ORDER

Based upon the stipulation of counsel, the Court hereby vacates the January 24, 2011
March 7
sentencing hearing, and sets a new sentencing date of ~~February 28~~, 2011, at 10:00 a.m.

DATED: 1/20/2011

THE HON. MARILYN H. PATEL
United States District Judge

